

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON INC. PELVIC REPAIR	)	MDL Docket No. 2327
SYSTEM PRODUCTS LIABILITY	)	HONORABLE JUDGE JOSEPH R.
LITIGATION	)	GOODWIN

**UNOPPOSED MOTION FOR APPOINTING RONALD E. CORKERN, JR. AS SPECIAL  
MASTER FOR PRIVATE SETTLEMENT AGREEMENT BETWEEN ETHICON  
AND CERTAIN PLAINTIFFS' COUNSEL**

Salim-Beasley, LLC, as counsel for certain plaintiffs in this MDL 2327, hereby moves the Court for entry of an Order to appoint Ronald E. Corkern, Jr. as Special Master to perform certain defined functions related to the administration and implementation of the Confidential Master Settlement Agreement as agreed by Plaintiffs' Counsel and Ethicon. Specifically as agreed by the parties, Ronald E. Corkern, Jr., as the Special Master for the administration of the confidential settlement, will perform certain duties of the Special Master, in furtherance of the fair and efficient administration and implementation of the settlements. This Motion also seeks permission for the Special Master to have *ex parte* communications with the parties to the Settlement Agreement, i.e., Plaintiffs' Counsel and their clients, Ethicon and its counsel, or the Court, and such *ex parte* communications shall not be deemed to have waived any attorney-client privileges.

For reasons stated above, Salim-Beasley, LLC respectfully requests that the Court appoint Ronald E. Corkern, Jr. as Special Master for the private settlement agreement between Salim-Beasley, LLC and Ethicon and enter an Order in the form submitted herewith.

DATED: May 17, 2017

SALIM-BEASLEY, LLC

/s/Robert L. Salim  
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***Counsel for Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2017 a true and correct copy of the foregoing document has been filed electronically and is available for viewing and downloading from ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in the MDL.

/s/Robert L. Salim  
Robert L. Salim